

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

INTEGRATED TECHNOLOGIES,)
INTERNATIONAL, LLC,)
Plaintiff,)
V.) Civil Action File No.:
YANFENG NORTH AMERICA,)
YANFENG US AUTOMOTIVE)
INTERIOR SYSTEMS I LLC, and)
YANFENG AUTOMOTIVE)
INTERIORS,)
Defendants.)

**DEFENDANTS' CERTIFICATE OF INTERESTED PERSONS AND
CORPORATE DISCLOSURE STATEMENT**

Pursuant to Rule 7.1 of the Federal Rules of Civil Procedure and Rule 3.3 of the Local Rules of the Northern District of Georgia, Defendants Yanfeng International Automotive Technology US I LLC d/b/a Yanfeng North America (“Yanfeng North America”), Yanfeng US Automotive Interior Systems I LLC n/k/a Yanfeng International Automotive Technology US I LLC (“Yanfeng International”), and Yanfeng International Automotive Technology US I LLC d/b/a Yanfeng Automotive Interiors (“Yanfeng Automotive”) make the following disclosures:

- 1. The undersigned counsel of record certifies that the following is a full and complete list of all parties, including proposed intervenors, in this action, including any parent corporation and any publicly held corporation that owns 10% or more of the stock of a party or proposed intervenor.**

Plaintiff: Integrated Technologies, International, LLC (“Integrated Technologies”). No corporation holds 10% or more of the stock of Integrated Technologies. The sole member of Integrated Technologies is Daniel Welton.

Defendants:

- a. Yanfeng International. The sole member of Yanfeng International is Yanfeng International Automotive Technology US LLC. The sole two members of Yanfeng International Automotive Technology US LLC are Yanfeng International Automotive Technology Hungary Kft. (a company incorporated under the laws of Hungary) and Yanfeng International Automotive Technology Co., Ltd. (a company incorporated under the laws of the People’s Republic of China (“China”)).
- b. There is no separate legal entity by the name of “Yanfeng North America”. Instead, named Defendant Yanfeng International uses the phrase “Yanfeng North America” to refer to Yanfeng International.
- c. There is no separate legal entity by the name of “Yanfeng Automotive Interiors”. Instead, named Defendant Yanfeng International uses the phrase “Yanfeng Automotive Interiors” to refer to Yanfeng International.

2. The undersigned counsel of record certifies that the following is a full and complete list of all other persons, associations, firms, partnerships, or

corporations having either a financial interest in or other interest which could be substantially affected by the outcome of this particular case:

Plaintiff: The entity and person identified in paragraph 1.

Defendants: The entities identified in paragraph 1.

3. The undersigned counsel of record certifies that the following is a full and complete list of all persons serving as attorneys for the parties, including proposed intervenors, in this proceeding:

Counsel for Plaintiff:

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**Pro Hac Vice applications to be filed*

4. Jurisdiction for this case is based on complete diversity under 28 U.S.C. § 1332(a). The undersigned certifies that the following is a full and complete list of the citizenship of every individual or entity whose citizenship is attributed to a party or proposed intervenor on whose behalf this certificate is filed.

Plaintiff Integrated Technologies International, LLC is a domestic limited liability company incorporated under the laws of the state of Georgia, with its principal place of business at 1680 Roberts Blvd, Suite 406, Kennesaw, GA, 30144. Daniel Welton, the sole member of Integrated Technologies, is a citizen of Georgia. Therefore, Integrated Technologies is a citizen of Georgia for diversity purposes.

Yanfeng International Automotive Technology US LLC is the sole member of Yanfeng International. Yanfeng International Automotive Technology Hungary Kft. (a company incorporated under the laws of Hungary) and Yanfeng International Automotive Technology Co., Ltd. (a company incorporated under the laws of China) are the sole two members of Yanfeng International Automotive Technology US LLC. Therefore, Yanfeng International is a citizen of Hungary and China for diversity purposes.

There is no separate legal entity by the name of “Yanfeng North America”. Instead, named Defendant Yanfeng International uses the phrase “Yanfeng North America” to refer to Yanfeng International. As noted, Yanfeng International is a

citizen of Hungary and China for diversity purposes. Therefore, Defendant Yanfeng North America is a citizen of Hungary and China for diversity purposes.

There is no separate legal entity by the name of “Yanfeng Automotive Interiors”. Instead, named Defendant Yanfeng International uses the phrase “Yanfeng Automotive Interiors” to refer to Yanfeng International. As noted, Yanfeng International is a citizen of Hungary and China for diversity purposes. Therefore, Defendant Yanfeng Automotive is a citizen of Hungary and China for diversity purposes.

Respectfully submitted this 14th day of December, 2023.

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Counsel for Defendants

CERTIFICATE OF SERVICE AND COMPLIANCE

I hereby certify that on December 14, 2023, I electronically filed the foregoing with the CM/ECF system, which will send email notification to all counsel of record. I further certify that this Certificate of Interested Persons and Corporate Disclosure Statement was prepared in accordance with the typeface and font requirements of N.D. Ga. L.R. 5.1.

Respectfully submitted this 14th day of December, 2023.

/s/ Henry D. Fellows, Jr.
Henry D. Fellows, Jr.